



Myron Burr
Sr. Mgr. EHS

Siltronic Corporation
7200 NW Front Avenue M/S, 50
Portland OR 97210-3676, USA
Tel. 503-219-7832
Fax 503-219-4121
myron.burr@siltronic.com

2016-04-28

VIA E-MAIL

Harold R. Moore III
Nationwide Indemnity Company
Environmental Claim Unit
94 Lake Street
Salem, NH 03079

Re: Supplement to April 22, 2016 Letter
Siltronic Corporation v. Employers Insurance Company of Wausau, et al.
USDC Case No. 11-CV-1493-ST
Our File No. 46454-38912


Dear Harold:

Further to my earlier letter (attached), which demands defense from Wausau pursuant to the court's Second Amended Opinion and Order with regard to its obligations under the 1978-79 Policies, I attach for your information a spreadsheet summary of Granite State's accounting of all such costs that Granite State has declined for payment or reimbursement for the stated reason that such costs relate solely to actions to address "MGP-Only." Although Siltronic does not concede either this factual characterization or the import assigned to this distinction by either Wausau or Granite State, at a minimum these costs are reimbursable as defense costs under the existing court Order. Also, please note that Siltronic may have a difference with this accounting by Granite State. However, we believe that this accounting is the minimum due to Siltronic. So, as previously requested, please confirm that Wausau will immediately commit to prompt reimbursement of the attached costs as defense costs under the 78-79 Policies, and to undertake future defense for the same reason.

Also as before, your prompt attention to this matter is appreciated.

Best regards,

Siltronic Corporation



Myron Burr, PE
Sr. Manager EHS



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cc: Christopher L. Reive
Robert Horkovich
Bryan M. Barber
W. David Campagne
Steven Soha
Gary V. Abbott

SILTRONIC - SUMMARY OF MFA DEDUCTIONS

INVOICE NO.	DATE	ACTIVITY	INVOICE AMOUNT	Deduction
13582	Dec 2009	MFA - Remedial Investigation	\$14,925.85	\$230.80
13716	Jan 2010	MFA - Remedial Investigation	\$18,031.35	\$996.80
13719	Jan 2010	MFA - Source Area Bioremed	\$68,093.21	\$138.55
13745	Feb 2010	MFA - Remedial Investigation	\$8,234.72	\$892.22
13747	Feb 2010	MFA - Source Area Bioremed	\$83,970.54	\$114.22
13918	Mar 2010	MFA - Remedial Investigation	\$4,431.22	\$627.50
13923	Mar 2010	MFA - Source Area Bioremed	\$57,914.14	\$26.63
14062	Apr 2010	MFA - Remedial Investigation	\$20,063.68	\$6,643.03
14021	Apr 2010	MFA - Source Area Bioremed	\$94,663.21	\$375.39
14070	May 2010	MFA - Remedial Investigation	\$4,133.75	\$300.00
14205	Jun 2010	MFA - Early Action	\$9,545.00	\$1,162.50
14202	Jun 2010	MFA - Remedial Investigation	\$8,202.78	\$1,109.85
14204	Jun 2010	MFA - Source Area Bioremed	\$44,658.98	\$219.44
14300	Jul 2010	MFA - Early Action	\$9,572.50	\$3,435.00
14411	Aug 2010	MFA - Source Area Bioremed	\$40,641.78	\$362.11
14518	Sep 2010	MFA - Remedial Investigation	\$6,100.41	\$1,147.50
14520	Sep 2010	MFA - Source Area Bioremed	\$79,972.03	\$171.34
14713	Oct 2010	MFA - Allocation Support	\$12,056.20	\$370.95
14712	Oct 2010	MFA - Early Action	\$32,425.08	\$351.98
14709	Oct 2010	MFA - Remedial Investigation	\$8,417.35	\$851.50
14735	Nov 2010	MFA - Allocation Support	\$4,103.13	\$170.33
14734	Nov 2010	MFA - Early Action	\$61,056.25	\$2,597.50
14732	Nov 2010	MFA - Remedial Investigation	\$9,262.23	\$3,865.25
14733	Nov 2010	MFA - Source Area Bioremed	\$58,498.64	\$368.29
15030	Jan 2011	MFA - Allocation Support	\$19,300.15	\$11.04
15024	Jan 2011	MFA - Remedial Investigation	\$18,776.50	\$1,057.78
14994	Jan 2011	MFA - Source Area Bioremed	\$90,313.50	\$968.26
15073	Feb 2011	MFA - Source Area Bioremed	\$57,621.97	\$205.64
15161	Mar 2011	MFA - Source Area Bioremed	\$44,901.52	\$366.13
15302	Apr 2011	MFA - Remedial Investigation	\$20,547.55	\$5,957.90
15392	May 2011	MFA - Remedial Investigation	\$6,734.37	\$2,055.00
15507	Jun 2011	MFA - Allocation Support	\$6,796.76	\$6.16
15505	Jun 2011	MFA - Source Area Bioremed	\$100,209.28	\$216.48
15621	Jul 2011	MFA - Remedial Investigation	\$7,429.98	\$436.23
15622	Jul 2011	MFA - Source Area Bioremed	\$239,695.92	\$387.93
15751	Aug 2011	MFA - Source Area Bioremed	\$66,899.37	\$376.88
16451	Feb 2012	MFA - Remedial Investigation	\$4,693.75	\$23.75
16452	Feb 2012	MFA - Feasibility Study	\$248.75	\$248.75
16585	Mar 2012	MFA - Remedial Investigation	\$9,421.05	\$4,888.75
17165	Jul 2012	MFA - Remedial Investigation	\$12,745.80	\$47.50
17799	Nov 2012	MFA - Source Area Bioremed	\$51,454.41	\$1,248.35
18077	Jan 2013	MFA - Source Area Bioremed	\$27,766.03	\$100.00
18513	Apr 2013	MFA - Remedial Investigation	\$10,778.75	\$2,421.56
18514	Apr 2013	MFA - Feasibility Study	\$24,113.41	\$1,044.07
19119	Aug 2013	MFA - Feasibility Study	\$14,036.60	\$1,321.92
19637	Nov 2013	MFA - Source Area Bioremed	\$19,178.55	\$93.00
19763	Dec 2013	MFA - Remedial Investigation	\$98,839.24	\$1,318.58
19764	Dec 2013	MFA - Feasibility Study	\$16,217.85	\$2,048.75
19766	Dec 2013	MFA - Early Action	\$441.25	\$441.25
19921	Jan 2014	MFA - Early Action	\$256.25	\$256.25
20285	Mar 2014	MFA - Remedial Investigation	\$12,126.05	\$461.00
20288	Mar 2014	MFA - Early Action	\$1,501.25	\$1,501.25
20433	Apr 2014	MFA - Remedial Investigation	\$18,045.69	\$5,236.14
20673	Apr 2014	MFA - Early Action	\$1,467.85	\$1,467.85
20629	May 2014	MFA - Early Action	\$626.25	\$626.25
20818	Jun 2014	MFA - Remedial Investigation	\$20,254.20	\$2,302.50
22716	Mar 2015	MFA - Remedial Investigation	\$93,840.45	\$26.40
23227	May 2015	MFA - Remedial Investigation	\$118,781.79	\$216.15
23637	Jul 2015	MFA - Remedial Investigation	\$81,379.91	\$119.75
		Totals	\$2,076,416.03	\$66,033.88